

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>UNITED STATES OF AMERICA</b>	§	
<b>VS.</b>	§	<b>Cause No. 4:20-CR-00125</b>
<b>SUMMER HEATHER WORDEN</b>	§	

**MOTION TO ALLOW OUT-OF-STATE TRAVEL**

**AND MOTION TO SEAL**

**TO THE HONORABLE ALFRED H. BENNETT, UNITED STATES DISTRICT  
JUDGE FOR THE SOUTHERN DISTRICT OF TEXAS:**

**NOW COMES SUMMER HEATHER WORDEN**, Defendant, and files this  
“Motion to Allow Out-of-State Travel, and Motion to Seal,” and in support shows:

1. On February 27, 2020, the defendant was charged with two counts of false statements in violation 18 United States Code, Section 1001(a)(2).

2. On December 1, 2022, the government filed a superseding indictment against Ms. Worden with additional allegations. Following a detention hearing, Ms. Worden was placed on bond. As of the filing date of this motion, Ms. Worden is in compliance with all bond conditions.

3. On May 24, 2023, defense counsel emailed AUSA John Pearson to determine whether the government will oppose this request.

SPECIFIC REQUEST FOR TRAVEL AND FOR  
MODIFICATION OF BOND CONDITION

Ms. Worden requests to travel to Stillwater, Oklahoma, from June 2, 2023, through June 4, 2023. The purpose of this trip is to attend a youth state qualifier baseball tournament in which her minor son is scheduled to play.

If approved by this Court, Ms. Worden and her son will stay at the following hotel:

Wyndham Garden Stillwater  
600 E. McElroy Rd.  
Stillwater OK 74075

This address is in neighboring Oklahoma, but is approximately a two-hour drive from the residence where Ms. Worden lives with her son. If approved, Ms. Worden will drive to the tournament with her son, stay at the hotel indicated above, and drive home at the conclusion of the tournament.

REQUEST TO SEAL

**Defendant further requests that this motion, and its order, be filed under seal, and remain so, until further order of the Court.**

**WHEREFORE, PREMISES CONSIDERED,** Defendant requests that this Court authorize the travel request above.

Respectfully submitted

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By: /s/ Shawn Sareen  
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CERTIFICATE OF SERVICE

I hereby certify that on this the 25th day of May, 2023, a copy of the foregoing “Motion to Allow Out-of-State Travel and Motion to Seal” has been delivered to opposing counsel in charge of this case, *via* ECF electronic filing.

/s/ Mac Bozza

Mac Bozza

**CERTIFICATE OF CONSULTATION**

This is to certify that the undersigned counsel conferred with the Assistant United States Attorney regarding this motion and:

\_\_\_\_\_ He does not oppose it.

\_\_\_\_\_ He does oppose it.

\_\_\_\_\_ Our attempts to resolve it were unsuccessful.

\_\_\_\_\_ Counsel were able to agree regarding the motion as follows:

\_\_\_\_\_

\_\_\_\_\_

  X   Counsel's attempt to contact the Government was unsuccessful.

/s/ Mac Bozza  
Mac Bozza

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE WESTERN DISTRICT OF TEXAS**  
**SAN ANTONIO DIVISION**

<b>UNITED STATES OF AMERICA</b>	<b>§</b>	
<b>VS.</b>	<b>§</b>	<b>Cause No. 4:20-CR-00125</b>
<b>SUMMER HEATHER WORDEN</b>	<b>§</b>	

**ORDER GRANTING DEFENDANT’S MOTION TO  
ALLOW OUT-OF-STATE TRAVEL,  
AND ORDER TO SEAL**

On this day, the Court considered Defendant’s “Motion to Allow Out-of-State Travel, and Motion to Seal” and **IT IS HEREBY ORDERED:**

1. Defendant is granted permission to travel outside the state of Kansas, to Stillwater Oklahoma, on the dates of June 2, 2023 through June 4, 2023.

2. It is ORDERED that this order, and its sponsoring motion, are to be filed under seal, and remain so, until further order of the Court.

IT IS SO ORDERED. The District Court is directed to enter this order and provide copies to counsel on this the \_\_\_\_\_ day of May, 2023.

\_\_\_\_\_  
**ALFRED H. BENNETT,**  
United States District Judge